

stated policy and interpretation of its City ordinance is a violation of her First Amendment rights, and her claim that the laws the City relies on do not support the City's unconstitutional policy. (Dkt. 55 at 3-6.) Nor would it do anything to alter the City's contention that its policy against Plaintiff's leafleting activity is also justified based on Mass Gen. Laws. Ch. 266, § 126.

At bottom, the City is asking the Court to stay the case for some undetermined period of time based on proposed amendments that have no guarantee of passing and which expressly cover the very type of conduct that the City contends Plaintiff is engaging in—commercial leafleting (which she is not). This is plainly not a situation that warrants a stay.

Conclusion

For the foregoing reasons, Plaintiff respectfully requests that the Court deny the City's motion for leave to file a reply, deny the City's motion to stay, and re-institute the summary judgment schedule, requiring the City to respond to Plaintiff's motion for summary judgment by April 15, 2015. Should the Court permit Defendant to file a reply, Plaintiff respectfully requests that it be permitted to file a short sur-reply.

Dated: March 31, 2015

Respectfully submitted,

/s/ Julia M. Ong

Kevin S. Prussia (BBO# 666813)
Thaila K. Sundaresan (BBO# 683616)
Julia M. Ong (BBO# 685014)
WILMER CUTLER PICKERING
HALE AND DORR, LLP
60 State Street
Boston, MA 02109
Telephone: 617-526-6000
Facsimile: 617-526-5000
kevin.prussia@wilmerhale.com
thaila.sundaresan@wilmerhale.com
julia.ong@wilmerhale.com

Of Counsel:

Matthew R. Segal (BBO# 654489)
AMERICAN CIVIL LIBERTIES UNION
OF MASSACHUSETTS
211 Congress Street, 3rd Floor
Boston, MA 02110
Telephone: 617-482-3170
Facsimile: 617-451-0009
msegal@aclum.org

Attorneys for Plaintiff Paula F. Soto

Certificate of Service

I, Julia M. Ong, hereby certify that PLAINTIFF PAULA F. SOTO'S OPPOSITION TO DEFENDANT CITY OF CAMBRIDGE'S MOTION FOR LEAVE TO FILE REPLY TO PLAINTIFF'S PAULA F. SOTO'S OPPOSITION TO MOTION TO STAY filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 31, 2015.

/s/ Julia M. Ong

Julia M. Ong